

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

Arlington Technologies LLC v. RingCentral, Inc.

Arlington Tech. · No. 1:25-cv-00613-JCG · Decided March 10, 2026

SUMMARY

The opinion and order addresses RingCentral, Inc.’s Rule 12(b)(6) motion to dismiss Arlington Technologies LLC’s patent-infringement claims involving eight asserted patents and various RingCentral products. The court grants the motion in part and denies it in part, including dismissing Counts I–IV with leave to amend based on deficiencies in the allegations concerning Apache Kafka and Apache Kafka streams.

CASE DETAILS

COURT	United States District Court for the District of Delaware
WRITING FOR THE COURT	Jennifer Choe-Groves
JURISDICTION	United States District Court for the District of Delaware
DECIDED	March 10, 2026
DOCKET	1:25-cv-00613-JCG
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved under Federal Rule of Civil Procedure 12(b)(6) to dismiss the First Amended Complaint alleging direct, induced, contributory, and willful infringement of eight patents. The court granted the motion as to Counts I-IV and VII, denied it as to Counts V, VI, and VIII, and granted leave to amend.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded factual allegations as true and draws reasonable inferences in favor of the nonmoving party. Under the Iqbal/Twombly plausibility standard, the complaint must contain sufficient factual matter to state a facially plausible claim and must provide fair notice of the grounds for infringement. Conclusory recitations of claim elements are insufficient.
PRECEDENTIAL VALUE	unpublished district court opinion

TOPICS

- patent infringement
- motions to dismiss
- pleadings
- intellectual property
- civil procedure

PRACTICE AREAS

patent law

patent infringement

civil procedure

QUESTIONS PRESENTED

1. Whether Counts I-IV plausibly pleaded direct, induced, and contributory patent infringement where the allegations concerning RingCentral's use of Apache Kafka and Apache Kafka streams were unclear and inadequately connected to the asserted claims.
2. Whether Counts V, VI, and VIII plausibly pleaded direct infringement by identifying the accused products and explaining how they allegedly met the elements of asserted patent claims.
3. Whether Count VII plausibly pleaded direct infringement where the amended complaint referred to the wrong patent claim and included an incorrect patent exhibit.
4. Whether the allegations for Counts V, VI, and VIII plausibly pleaded induced infringement, including knowledge, affirmative acts, and specific intent.
5. Whether the allegations for Counts V, VI, and VIII plausibly pleaded contributory infringement and willful infringement, and whether the demand for enhanced damages could be stricken under Rule 12(f).

HOLDINGS

1. A patent-infringement complaint must include factual allegations connecting the accused product to the elements of an asserted claim and must provide fair notice of how infringement is alleged; merely reciting claim elements and conclusorily asserting that the accused product contains them is insufficient.
2. Counts I-IV did not satisfy the pleading standard because the amended complaint failed to plead clearly how RingCentral's accused products used Apache Kafka or Apache Kafka streams in a manner that infringed the asserted patent claims.
3. Counts V, VI, and VIII plausibly stated claims for direct patent infringement and survived the Rule 12(b)(6) motion.
4. To plead induced infringement, a plaintiff must plausibly allege direct infringement, the defendant's knowledge of the patent and that the induced acts constitute infringement, an affirmative act encouraging infringement, and specific intent to encourage another's infringement. Counts V, VI, and VIII satisfied that standard.
5. A contributory-infringement claim requires allegations that the defendant sold or offered to sell a component especially made or adapted for infringing use, knowing of that use, and lacking substantial non-infringing uses. Counts V, VI, and VIII adequately pleaded contributory infringement.
6. At the pleading stage, a willful-infringement theory may proceed where the allegations plausibly show that the accused infringer was aware of the patent, continued infringing after learning of it, and knew or should have known that its conduct amounted to infringement. The allegations for Counts V, VI, and VIII met that standard.
7. The court granted Arlington Technologies leave to file a Second Amended Complaint to attempt to cure the pleading defects.

KEY QUOTATIONS

“To plead direct infringement, a plaintiff must recite “some factual allegations that, when taken as true, articulate why it is plausible that the accused product infringes the patent claim.”” (at 1353)

“It is axiomatic that there can be no inducement or contributory infringement without an underlying act of direct infringement.” (at 1333)

*“Regardless of whether a demand for enhanced damages under § 284 is based on willful conduct or on behavior that is wanton, malicious, deliberate, consciously wrongful, flagrant, done in bad faith, or characteristic of a pirate, such a demand is not a claim that can be dismissed pursuant to Rule 12(b)(6).” (*4)*

FACTUAL BACKGROUND

Arlington Technologies owns eight asserted patents concerning communications, failover, conferencing, meeting permissions, and audio-triggered action items. It alleged that RingCentral’s Webinar, RingSense, Video Meetings, and Rooms products directly and indirectly infringed those patents and that RingCentral willfully infringed after receiving pre-suit communications, patent lists, and claim charts beginning in March 2024. The amended complaint included detailed claim-element allegations for Counts V, VI, and VIII, but contained pleading and exhibit errors concerning the use of Apache Kafka and Kafka streams in Counts I-IV, the patent claim identified in Count VII, and the patent attached to Exhibit 8.

PROCEDURAL HISTORY

Arlington Technologies filed the action on May 16, 2025, and later filed a First Amended Complaint on August 13, 2025. RingCentral moved to dismiss the amended pleading on October 1, 2025, arguing that the direct, indirect, and willful infringement allegations were insufficient. After oral argument on February 19, 2026, the court granted the motion in part, denied it in part, and ordered Arlington Technologies to file a Second Amended Complaint.

DISPOSITION

other

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 664, 678 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555-56, 570 (2007)
- Golden v. Apple Inc., 819 F. App’x 930, 930-31 (Fed. Cir. 2020)
- Bot M8 LLC v. Sony Corp. of Am., 4 F.4th 1342, 1352-53 (Fed. Cir. 2021)
- Disc Disease Sols. Inc. v. VGH Sols., Inc., 888 F.3d 1256, 1260 (Fed. Cir. 2018)
- Boston Sci. Corp. v. Nevro Corp., 415 F. Supp. 3d 482, 489-90 (D. Del. 2019)
- SIPCO, LLC v. Streetline, Inc., 230 F. Supp. 3d 351, 353 (D. Del. 2017)
- WiTricity Corp. v. Momentum Dynamics Corp., 563 F. Supp. 3d 309, 328 (D. Del. 2021)
- Dermafocus LLC v. Ulthera, Inc., 201 F. Supp. 3d 465, 469 & n.3 (D. Del. 2016)

- Carborundum Co. v. Molten Metal Equip. Innovations, Inc., 72 F.3d 872, 878 (Fed. Cir. 1995)
- Advanced Cardiovascular Sys., Inc. v. Medtronic, Inc., 265 F.3d 1294, 1303 (Fed. Cir. 2001)
- In re Bill of Lading Transmission & Processing Sys. Patent Litig., 681 F.3d 1323, 1333, 1337, 1339 (Fed. Cir. 2012)
- Lifetime Indus., Inc. v. Trim-Lok, Inc., 869 F.3d 1372, 1379 (Fed. Cir. 2017)
- Global-Tech Appliances, Inc. v. SEB S.A., 563 U.S. 754, 764-66, 769 (2011)
- Microsoft Corp. v. DataTern, Inc., 755 F.3d 899, 904 (Fed. Cir. 2014)
- Commil USA, LLC v. Cisco Sys., Inc., 575 U.S. 632, 640 (2015)
- Tonal Sys., Inc. v. ICON Health & Fitness, Inc., No. 20-cv-1197-LPS, 2021 WL 1785072, at *3 (D. Del. May 5, 2021)
- Vita-Mix Corp. v. Basic Holding, Inc., 581 F.3d 1317, 1327-28 (Fed. Cir. 2009)
- Halo Elecs., Inc. v. Pulse Elecs., Inc., 579 U.S. 93, 101, 103-05 (2016)
- Valinge Innovation AB v. Halstead New England Corp., No. 16-cv-1082-LPS-CJB, 2018 WL 2411218, at *12-13 (D. Del. May 29, 2018), report and recommendation adopted, No. 16-cv-1082-LPS-CJB, 2018 WL 11013901 (D. Del. Nov. 6, 2018)
- Elm 3DS Innovations, LLC v. Samsung Elecs. Co., Ltd., No. 14-cv-1430-LPS-CJB, 2015 WL 5725768, at *3 (D. Del. Sept. 29, 2015), report and recommendation adopted, No. 14-cv-1430-LPS-CJB, 2016 WL 1274812 (D. Del. Mar. 21, 2016)
- SoftView LLC v. Apple Inc., No. 10-389-LPS, 2012 WL 3061027, at *6 (D. Del. July 26, 2012)
- Inari Med., Inc. v. Inquis Med., Inc., No. 24-cv-1023-CFC, 2025 WL 2912857, at *4 (D. Del. Oct. 14, 2025)